

1 Karl P. Schlecht (SBN 182294)
Karl.Schlecht@kts-law.com
2 Eli A. Gordon (SBN 252823)
Eli.Gordon@kts-law.com
Kimball, Tirey & St. John LLP
3 2040 Main Street, Suite 500
Irvine, CA 92614
4 Telephone: (949) 476-5585
Facsimile: (949) 502-5665
5

6 Attorneys for Defendants,
THIRD AND MISSION
7 ASSOCIATES, LLC; and RELATED
MANAGEMENT COMPANY, L.P.
8 (*incorrectly sued as The Related*
Companies, Inc.)
9

10 **THE UNITED STATES DISTRICT COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**

12 PETER HOLLAND and KRISTEN
13 HOLLAND,

14 Plaintiffs,

15 vs.

16
17 THE RELATED COMPANIES, INC.;
THIRD AND MISSION
18 ASSOCIATES, LLC, DOES 1
THROUGH 10,
19

20 Defendants.
21
22
23
24
25

Hon. Judge Jeffery S. White

Case No. 4:15-CV-03220 JSW

**JOINT STIPULATION TO
EXTEND DISCOVERY CUT OFF
DATE AND ~~PROPOSED~~ ORDER**

Complaint Filed: July 10, 2015

Current Discovery Cut-Off Date:
January 15, 2016

Proposed New Discovery Cut-Off
Date: March 10, 2016

26 ///

27 ///

28 ///

1 1. WHEREAS, this case was filed on July 10, 2015, on July 23rd the Court
2 granted a motion for preliminary injunction filed by plaintiffs, and on August 14th
3 defendants appealed that ruling, which appeal is pending;

4 2. WHEREAS, on October 8, 2015, the Court set the following litigation
5 schedule for this case:

6 Discovery Cut-off: January 15, 2016

7 Designation of Experts: February 15, 2016

8 Hearing of Dispositive Motions: April 15, 2016

9 Pretrial Conference: June 27, 2016 at 2:00 p.m.

10 Jury Selection and Trial: August 1, 2016 at 8:00 a.m.

11 3. WHEREAS, on or about November 13, 2015, counsel for Defendants
12 THIRD AND MISSION ASSOCIATES, LLC; and RELATED MANAGEMENT
13 COMPANY, L.P. (*incorrectly sued as The Related Companies, Inc.*)
14 (“Defendants”) and counsel for Plaintiffs PETER HOLLAND and KRISTEN
15 HOLLAND (“Plaintiffs”) participated in a further Rule 26f conference in order to
16 meet and confer regarding the remaining discovery, deposition, and scheduling
17 issues in this matter;

18 4. WHEREAS, during said conference, it was determined between
19 counsel that, given the substantial amount of discovery left to be conducted in this
20 matter, including, but not limited to, over a dozen depositions, some occurring out
21 of state; the presence of the holiday season; and obligations of counsel in cases
22 other than the present matter; the discovery cut-off date in this matter currently set
23 for January 16, 2016 should be continued to March 10, 2016 in order for the parties
24 to complete necessary discovery in this matter and in the interests of justice.

25 **IT IS HEREBY STIPULATED** by and between Plaintiffs, through their
26 counsel of record Celia McGuinness of the Law Offices of Paul Rein, and Steven
27 Derby of The Derby Law Firm, P.C., and Defendants, through their counsel of
28 record, Eli A. Gordon of Kimball, Tirey & St. John LLP, as follows:

1 The parties have agreed to request that the Court continue the discovery cut-
2 off date of January 16, 2016 s to March 10, 2016. All other pertinent dates set forth
3 in the court's case management order in this matter dated October 2, 2015 shall
4 remain the same.

5 Dated: November 23, 2015

6 LAW OFFICES OF PAUL L. REIN
7 Attorneys for Plaintiffs PETER
8 HOLLAND and KRISTEN
9 HOLLAND

10 By: /s/ Celia McGuinness
11 Celia McGuinness, Esq.

12 Dated: November 23, 2015

13 THE DERBY LAW FIRM, P.C.
14 Attorneys for Plaintiffs PETER
15 HOLLAND and KRISTEN
16 HOLLAND

17 By: /s/ Steven L. Derby
18 Steven L. Derby, Esq.

19 Dated: November 23, 2015

20 KIMBALL, TIREY & ST. JOHN LLP
21 Attorneys for Defendants
22 THIRD AND MISSION
23 ASSOCIATES, LLC; and RELATED
24 MANAGEMENT COMPANY, L.P.
25 (*incorrectly sued as The Related*
26 *Companies, Inc.*)

27 By: /s/ Eli A. Gordon
28 Eli A. Gordon, Esq.

SIGNATURE CERTIFICATION

Pursuant to Local Rule 5-1(i)(3), I hereby certify that the content of this document is acceptable to Celia McGuinness and Steven L. Derby, counsel for Plaintiffs, and that I have obtained their authorization to affix their respective electronic signatures to this document. I hereby attest that I have on file all holographic signatures corresponding to any signatures indicated by a conformed signature (/S/) within this e-filed document.

DATED: November 23, 2015

KIMBALL, TIREY & ST. JOHN LLP

By: /s/ Eli A. Gordon
Eli A. Gordon
Attorney for Defendants,
THIRD AND MISSION
ASSOCIATES, LLC; and RELATED
MANAGEMENT COMPANY, L.P.
*(incorrectly sued as The Related
Companies, Inc.)*

~~[PROPOSED]~~ AMENDED CASE MANAGEMENT ORDER

Upon the stipulation of the parties, and good cause appearing therefore, the case management order in this matter which entered on October 2, 2015 is hereby amended as follows:

1. The discovery cut-off date of January 16, 2016 is vacated and continued to March 10, 2016.
2. All other applicable dates contained in said order shall remain unchanged.

Dated: November 30, 2015


Hon. Jeffrey S. White